

1 UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF PENNSYLVANIA

3 BOARHEAD FARM AGREEMENT CIVIL ACTION NO.
4 GROUP, 02-CV-3830
Judge Legrome D. Davis

5 Plaintiff, ORAL DEPOSITION OF:

6 vs. MANFRED DeREWAL, JR.

7 ADVANCED ENVIRONMENTAL TECHNOLOGY
8 CORPORATION; ASHLAND CHEMICAL
9 COMPANY; BOARHEAD CORPORATION;
10 CARPENTER TECHNOLOGY CORPORATION;
11 CROWN METRO, INC.; DIAZ CHEMICAL
12 CORPORATION; EMHART INDUSTRIES,
13 INC.; ETCHED CIRCUITS, INC.; FCG,
14 INC.; GLOBE DISPOSAL COMPANY, INC.;
15 GLOBE-WASTECH, INC.; HANDY & HARMAN
16 TUBE COMPANY, INC.; KNOLL, INC.;
17 MERIT METAL PRODUCTS CORPORATION;
18 NOVARTIS CORPORATION; NRM INVESTMENT
19 COMPANY; PLYMOUTH TUBE COMPANY;
20 QUIKLINE DESIGN AND MANUFACTURING
21 COMPANY; RAHNS SPECIALTY METALS,
22 INC.; ROHM & HAAS COMPANY, SIMON
WRECKING COMPANY, INC.; TECHALLOY
COMPANY, INC.; THOMAS & BETTS
CORPORATION; UNISYS CORPORATION;
UNITED STATES OF AMERICA
DEPARTMENT OF NAVY,

Defendants.

19 * * * * *
Monday, May 12, 2003
20 * * * * *

21 Transcript in the above matter taken at
22 the offices of Ballard, Spahr, Andrews & Ingersoll,
LLP, 1735 Market Street, 42nd Floor, Philadelphia,
Pennsylvania, commencing at 10:10 a.m.

23 Certified Shorthand Reporting Services
24 Arranged Through
Mastroianni & Formaroli, Inc.
25 709 White Horse Pike
Audubon, New Jersey 08106
(856) 546-1100

1 little bridge there.

2 Q. Enterprise Avenue?

3 A. No. What's the name of the bridge there?

4 Q. Hell, I don't know, I'm from California.

5 MR. HARRIS: Anybody know what the name
6 of that bridge is to help us?

7 MS. LEVIN: The Platt bridge?

8 THE WITNESS: The Platt bridge.

9 MR. HARRIS: Platt?

10 MS. LEVIN: P-L-A-T-T.

11 BY MR. HARRIS:

12 Q. Where else did it go?

13 A. It went to Boarhead Farms, and some loads
14 might have went to G.R.O.W.S landfill.

15 MR. FACKENTHAL: I'm sorry?

16 THE WITNESS: G.R.O.W.S.

17 BY MR. HARRIS:

18 Q. Now, at some point in time DeRewal Chemical
19 got the Wissinoming location?

20 A. Correct.

21 Q. Are the places you've been telling us about
22 where you took NRM waste?

23 A. There was a lapse there until Wissinoming or
24 another location was --

25 Q. Available?

1 A. -- available.

2 Q. Okay. So you've been telling us about --

3 A. I mean, back in those days, I mean, that's,
4 you did what -- you know, sometimes you just went over
5 to a manhole and popped it and...

6 Q. Okay. When the Wissinoming facility became
7 available, did any of the NRM go to Wissinoming?

8 A. What's that again?

9 Q. When the Wissinoming location opened up, did
10 you personally take any of the NRM to Wissinoming?

11 A. Yes.

12 Q. When the Wissinoming place opened up, did
13 you ever take any NRM stuff anywhere else?

14 A. Not -- once we had a location like that we
15 stayed there unless, you know, something happened.

16 Q. You mean there was some reason you couldn't
17 go there that day?

18 A. That's correct.

19 Q. What kind of reasons would there be?

20 A. Either the DER, the Philadelphia, the city,
21 either the people were complaining about fumes in
22 certain buildings, and you were being watched.

23 Q. During the period that the Wissinoming
24 location was available, did you personally take any NRM
25 waste to the Boarhead site?

1 A. While Wissinoming was open?

2 Q. Yes.

3 A. No.

4 Q. Was there a period of time when Wissinoming,
5 between when Wissinoming shut down and DeRewal went out
6 of the waste business?

7 A. A short time after that, after the
8 Wissinoming shut down we also acquired another place
9 off of Delaware Avenue that was only used for about a
10 month or two.

11 Because at that time, this was just about
12 near the wrapping up at the very end of DeRewal
13 Chemical which would have been late '77 or early '78.
14 And it depends where you're at or -- I mean, it's hard
15 to explain.

16 Q. Okay.

17 A. If you're being watched, you knew if you're
18 being watched, the cops, the city, then it would go
19 back to Boarhead Farms or it would go someplace else.

20 Q. Okay. After Wissinoming was shut down let's
21 just call it, you couldn't take stuff there, did you
22 personally ever take any NRM waste back to the Boarhead
23 Farm site?

24 MR. FACKENTHAL: Objection, asked and
25 answered.

1 MR. HARRIS: I don't remember, give me
2 the answer again anyway.

3 THE WITNESS: Yes.

4 BY MR. HARRIS:

5 Q. When I use the words "take back to the
6 Boarhead Farms site", you understand that I mean to
7 dispose of it there?

8 A. That's correct.

9 Q. Tell us a little more about this Delaware
10 Avenue location. What was it?

11 A. Ontario Street?

12 Q. No, after Wissinoming.

13 A. Oh, I think that was like around Pier 41.
14 It was a -- they used to store I guess rolls of paper.
15 They used to go out over the Delaware, the floors were
16 all wooden -- well, the whole building was actually
17 wooden, I believe they tore it down now.

18 We used to pull in and there used to be
19 manholes already inside the floors, and you would hook
20 up a hole and in it went.

21 Q. Into the river. How long was that operation
22 going for?

23 A. At that place there?

24 Q. Yeah, that particular spot.

25 A. I believe we only used that for about a

1 month.

2 Q. And that was after Wissinoming?

3 A. That's correct.

4 Q. Describe for us please the landfill down the
5 road from National Rolling Mills. Where was it?

6 A. I believe it was off of Route 100, it wasn't
7 that big of a landfill. I might have taken maybe two
8 or three loads there. We didn't use that landfill that
9 much. Marvin Jonas probably -- I mean, I believe
10 that's --

11 Q. Well, let's stick to what you did.

12 A. Okay.

13 Q. Do you remember a name for that landfill?

14 A. No, I don't.

15 Q. Do you remember the name of the guy who ran
16 it?

17 A. No, I don't.

18 Q. Or the girl who ran it, I don't want to be
19 sexist.

20 A. No, I don't.

21 Q. All right. Tell us a little bit about
22 underneath the bridge, underneath the Platt bridge.
23 What was there?

24 A. Well, they used to store a lot of vehicles
25 underneath the bridge and they just had open pits. A

1 lot of tankers at that time were pulling in there. You
2 had to pay in order to dump.

3 I never handed anybody any money, I didn't
4 know what the cost was per tanker. Back in those days
5 I would imagine it was cheap. It's probably 100, \$200
6 a tanker.

7 Q. How many loads of National Rolling Mills
8 waste did you personally take to this, underneath the
9 bridge?

10 A. To that site? Two or three.

11 MR. FACKENTHAL: I'm sorry, I didn't hear
12 you.

13 THE WITNESS: Two or three. There might
14 have been more, but personally --

15 MR. HARRIS: Yeah, I'm just focusing on
16 what you did.

17 BY MR. HARRIS:

18 Q. Now, how about the Boarhead Farms site
19 itself, how many loads of National Rolling Mills waste
20 did you personally take to the Boarhead Farms site for
21 disposal?

22 A. Max maybe ten loads, 15.

23 Q. Describe for us please how that worked.

24 A. Well, we had several rubber-lined tankers.
25 You would go in, either leave the truck there, jump

1 into another truck or drop that trailer and somebody
2 would have picked up the tanker, or you would have
3 dropped it off close to the location where it was going
4 to be dumped.

5 Q. I'm not sure I followed that, I'm sorry.

6 You drive into the farm?

7 A. Correct.

8 Q. And you drive to where?

9 A. Well, at that time --

10 Q. Yeah, you can refer to the map if you want.

11 A. At that time this road here started to exist
12 (indicating).

13 Q. Now, "this road here" the witness is
14 referring to --

15 A. The fork in the road.

16 Q. The southernmost fork in the road?

17 A. Right.

18 Q. And you'd drive along there?

19 A. Right.

20 Q. And what would happen next?

21 A. Either we would drop the tankers off here,
22 there were several pits here (indicating).

23 Q. Why don't you draw in some pits for me.

24 A. Okay. Lot of times, depending what it was,
25 what chemicals, there would be open pits covered by old

1 trees.

2 Q. Okay. You mean over the top?

3 A. Over the top, like a camouflage. And you
4 would either leave the truck there, drop the tanker --
5 at that time there was lot of room here, we used to
6 park several tankers here at that time. And this is
7 mainly where that type of chemical was emptied.

8 Q. Okay. Would you put a P inside the two
9 circles for pit, so we'll understand what we're talking
10 about? And just so the record is clear, you were
11 saying that you would drop the tanker near where the Ps
12 are on that road?

13 A. Right.

14 Q. Was there ever anywhere else on the Boarhead
15 property you personally disposed of National Rolling
16 Mills' waste?

17 A. There might have been. Me personally, no.

18 Q. How many loads of National Rolling Mills
19 waste did you personally take to the G.R.O.W.S.
20 landfill?

21 A. I might have taken 20.

22 Q. And describe where the G.R.O.W.S. landfill
23 is for us?

24 A. That's over towards, it's off 95, I don't
25 know if that's Route 1, off of Route 1. It's south of

1 Bensalem I guess it is, over by the steel plant, U.S.
2 Steel, whatever that location is. Since I've been gone
3 for a while, you know.

4 Q. Yeah. How did it work at G.R.O.W.S.?

5 A. You would also pull in, normally that -- you
6 did a lot of that after 5 o'clock, went in. That was
7 also I guess all cash. Whoever was running the front
8 gate.

9 Q. Okay. How many loads of National Rolling
10 Mills waste did you yourself take to the Boarhead site
11 after Wissinoming checked out or during the time
12 Wissinoming was open?

13 MR. FACKENTHAL: Objection, asked and
14 answered. That's been answered already.

15 THE WITNESS: Yes, I believe 10 or 15
16 loads.

17 BY MR. HARRIS:

18 Q. Oh, 10 or 12 times is all the times you took
19 National Rolling Mills?

20 A. Correct.

21 Q. Oh, okay.

22 MR. HARRIS: Let's mark this.

23 (EXHIBIT P-50, BILLS OF LADING, NATIONAL
24 ROLLING MILLS, IS MARKED FOR IDENTIFICATION)

25

1 Q. Okay. Where did you personally -- other
2 than Wissinoming, where did you personally take Ashland
3 waste?

4 A. Boarhead Farms.

5 Q. How many loads of Ashland waste did you take
6 to Boarhead Farms for disposal, you personally?

7 A. Eight to 15.

8 Q. And of those loads that you personally took
9 to Boarhead, where were they disposed of?

10 A. They were disposed in front of the office at
11 that time, right in front of the small pond.

12 Q. Okay.

13 A. Right in this section here (indicating).

14 Q. Let the record reflect that the witness is
15 pointing to an area on P-8 in between the word "office"
16 and the edge of the pond. Is that correct?

17 A. Yes.

18 Q. Did I do that right?

19 A. Yes.

20 Q. And how did that disposal take place?

21 A. Well, then also we would either drop that
22 tanker -- because that was a slow process, you had a
23 lot of fumes, a lot of nitratric fumes coming off. And
24 that was a slow process leech into this hole that was
25 dug, covered over.

1 Again, I don't want you to guess. If you think you
2 have a basis, you know, it was more than half --

3 A. Maybe more than half.

4 Q. Okay.

5 A. And should I give the --

6 Q. Yeah.

7 A. -- the reason why?

8 Q. Yes.

9 A. Because of this type of acid -- even though
10 when we had Wissinoming, because that's where most of
11 that acid went also prior to Boarhead Farms, we had
12 more problems dumping it in the city than at Boarhead
13 Farms because of the fumes, the nitric fumes.

14 Q. Was it easier to dump it at Boarhead?

15 A. Easier to dump it at Boarhead.

16 Q. All right. Let me ask you if you ever
17 picked up waste from a company called Flexible
18 Circuits?

19 A. Yes.

20 Q. Where was that facility located?

21 A. Warrington, Pennsylvania.

22 Q. How did you get there?

23 A. 611, Street Road. And whatever road we were
24 on, I don't know the name of the road.

25 Q. Is it off of Street Road?

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(VOLUME II)

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UNITED STATES OF AMERICA
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Tuesday, May 13, 2003
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1 testified about or that your father testified about or
2 that we asked about, and I want to start with some of
3 the ones you testified about yesterday, make sure I've
4 got a complete list. All right?

5 A. Okay.

6 Q. You've testified about disposal at Boarhead
7 Farm property itself, correct?

8 A. That's correct.

9 Q. You've also testified about disposal at
10 G.R.O.W.S., correct?

11 A. That's correct.

12 Q. And that disposal occurred between '72 and
13 '78?

14 MR. HARRIS: Objection.

15 THE WITNESS: No.

16 BY MR. DILLON:

17 Q. I'm not saying that included the entire
18 time, I'm saying it occurred sometime between '72 and
19 '78?

20 A. That's correct.

21 Q. And you did not neutralize material you took
22 to G.R.O.W.S. before you took it there?

23 A. That's correct.

24 Q. And so to the best of your knowledge
25 G.R.O.W.S. could accept acid that had not been

1 neutralized, correct?

2 MR. HARRIS: Objection.

3 THE WITNESS: They could have.

4 BY MR. DILLON:

5 Q. G.R.O.W.S. was able to and at least on one
6 or more than one occasion did accept from you acid that
7 had not been neutralized?

8 A. I believe so.

9 Q. Do you recall on how many different
10 occasions you might have gone to G.R.O.W.S.?

11 A. Myself, two.

12 Q. Were you aware that other drivers for
13 DeRewal Chemical were also disposing of material at
14 G.R.O.W.S.?

15 MR. HARRIS: Objection, I don't think
16 there's any evidence that that's so.

17 BY MR. DILLON:

18 Q. Are you aware of any other drivers from
19 DeRewal Chemical disposing of materials at G.R.O.W.S.?

20 A. To be honest with you -- I mean, I could be
21 honest -- I mean, not being honest about the question,
22 but I believe some other drivers probably went there.

23 Q. Try to get this record a little cleaner.
24 Based upon things you heard from other DeRewal
25 employees, do you believe that other drivers disposed

1 of materials at G.R.O.W.S.?

2 A. I believe so.

3 Q. You also discussed yesterday disposal at a
4 site off of Route 100?

5 A. That's correct.

6 Q. What do you recall -- you personally went to
7 the site off of Route 100?

8 A. That's correct.

9 Q. On more than one occasion?

10 A. I might have been there two times.

11 Q. Do you -- what do you recall about the site?

12 A. It was a very small dump site.

13 Q. You recall a trailer in the front?

14 A. I can't recall.

15 Q. Do you recall that it was residential all
16 around the area?

17 A. I can't recall that.

18 Q. Do you recall that it might have been in
19 Honeybrook?

20 A. Is that around Route 100 or south of NRC? I
21 don't know.

22 Q. Do you recall the name the Blosinski
23 Landfill, Joseph Blosinski?

24 A. That might ring a bell.

25 Q. That might ring a bell as the place on Route

1 100?

2 A. Yes.

3 Q. Okay. How did you learn about

4 Mr. Blosinski's landfill out in Westcon Township?

5 A. Be honest with you, I don't know, I don't
6 know who told me.

7 Q. Is it possible you learned about it from
8 Marvin Jonas?

9 MR. HARRIS: Objection.

10 THE WITNESS: Could have been.

11 BY MR. DILLON:

12 Q. Is it possible you learned about it from ABM
13 Disposal?

14 MR. HARRIS: Objection.

15 THE WITNESS: Could have been. Probably
16 more so Marvin Jonas and ABM.

17 BY MR. DILLON:

18 Q. You're not certain?

19 A. I'm not certain. I mean, I wouldn't have
20 learned, somebody else would have told me to go.

21 Q. "Someone else" meaning your father?

22 A. Yes, or Marvin.

23 Q. The best of your knowledge on what you've
24 heard driving for DeRewal Chemical, did other drivers
25 for DeRewal Chemical also use the Route 100 site?

1 MR. HARRIS: Objection, calls for
2 hearsay.

3 THE WITNESS: I don't know. I believe
4 that was only a one- or two-time deal.

5 BY MR. DILLON:

6 Q. You have no way of knowing for certain what
7 drivers used what site though, do you?

8 A. No, I do not.

9 Q. You also brought materials to Ontario
10 Street?

11 A. That's correct.

12 Q. On numerous occasions?

13 A. Uh-huh.

14 Q. While Ontario Street was opened you would
15 bring materials multiple times per week, correct?

16 A. That's correct.

17 Q. And the same would be true of Wissinoming
18 when Wissinoming was open, correct?

19 A. That's correct.

20 Q. And you know where Marvin Jonas's transfer
21 station is in Sewell, New Jersey, correct?

22 A. That's correct.

23 Q. And can you describe the entrance into
24 Marvin's transfer station?

25 A. Well, when you used to make a right in

1 there, I believe there was a golf course on the
2 left-hand side, clubhouse or whatever on the left. And
3 you'd go down and he was down maybe three quarters of a
4 mile on the left-hand side, you'd go down a dirt road.

5 Q. Down a fairly steep dirt road?

6 A. Down a steep dirt road, and there it was, a
7 couple trailers on the right.

8 Q. And you dropped trailers from DeRwal
9 Chemical at that location on occasion?

10 A. I believe so, yes.

11 Q. Over the years you dropped multiple trailers
12 there on occasion?

13 A. For Marvin or did we dump there?

14 Q. I didn't ask you whether you dumped there,
15 I'm asking whether you dropped DeRwal trailers there,
16 that is, you brought the trailer and disconnected it?

17 A. No, not DeRwal Chemical.

18 Q. What kind of trailers did you disconnect and
19 leave there?

20 A. They would have been Marvin's. We'd pick up
21 from there and drop off, would have been iron tankers,
22 six, 8,000-gallon tankers.

23 Q. So this was all when you were working on one
24 of Marvin's contracts?

25 A. That's correct.

1 Q. And so you don't believe you ever dropped
2 DeRewal trailers off there?

3 A. I believe not, no.

4 Q. Are you aware of other DeRewal drivers who
5 dropped DeRewal trailers off there?

6 MR. HARRIS: Objection, also hearsay.

7 THE WITNESS: I don't believe so, no.

8 BY MR. DILLON:

9 Q. You testified about the location under the
10 Platt Bridge, which I think some people refer to as the
11 Pennrose Avenue Bridge?

12 A. I believe.

13 Q. When you say "under the bridge", do you mean
14 physically underneath the span of the bridge?

15 A. No, it was to the left. You used to pull
16 in, I believe they used to have the cars, vehicles
17 underneath there. And that was only a one-time deal
18 also, but there was a lot of trucks going in and out of
19 there also at that time.

20 Q. Who directed you to that location?

21 A. Marvin Jonas.

22 Q. And to the best of your knowledge other
23 DeRewal drivers would also be free to use that
24 location?

25 MR. HARRIS: Objection.

1 THE WITNESS: I believe not.

2 BY MR. DILLON:

3 Q. Why would you say that?

4 A. I believe you had to pay to get in there.

5 Q. Did you pay the one time you went in?

6 A. No, I did not. I believe that was a Marvin
7 Jonas deal. Most of those landfills were paid through
8 Marvin Jonas.

9 Q. You also disposed of liquid waste at
10 Frenchtown you said yesterday?

11 A. Yeah, uh-huh.

12 Q. On occasion?

13 A. Very little.

14 Q. You also disposed of liquid waste at Pier
15 41?

16 A. That's -- I guess it was Pier 41. I don't
17 know if it's Pier 41 but -- it's ripped down now, it's
18 not there any longer. I think it's right up from Home
19 Depot, there's a light there.

20 Q. You're going south on Delaware Avenue with
21 the Delaware River on your left?

22 A. Right.

23 Q. And the piers are numbered as they go along
24 the Philadelphia waterfront?

25 A. Right.

1 Q. In your prior deposition to the EPA you
2 described it as a location near Delaware and Oregon
3 Avenue. Does that sound about right to you to where
4 you thought Pier 41 is?

5 A. No, I believe Oregon Avenue is too far
6 north. Maybe around Washington Avenue.

7 Q. Okay. Do you recall any location that
8 DeRewal used at Delaware and Oregon?

9 A. That was the Oregon Avenue, that's how we
10 used to get into the first place that was rented.

11 Q. Ontario Street?

12 A. Yeah. I mean, Oregon Avenue is not that far
13 away from Ontario Street. I believe we used to come
14 off of Oregon Avenue.

15 Q. Okay. At Pier 41 or whatever the pier was
16 called, you would simply empty the waste into the
17 manhole that would drop it straight into the river?

18 A. That's correct.

19 Q. Were there other locations along the
20 Delaware that you also used to dispose of liquid waste
21 there?

22 A. Besides Ontario and Wissinoming?

23 Q. Yes.

24 A. No.

25 Q. Did you ever drop any tank trailers under

1 A. Yes, that's correct.

2 Q. Do you recall whether DeRewal Chemical had a
3 waste disposal location on Tioga Street in
4 Philadelphia?

5 A. No, I do not.

6 Q. That doesn't ring any bells for you?

7 A. No.

8 Q. Do you recall that DeRewal Chemical had a
9 facility in Allentown in an old cement factory?

10 A. Yes.

11 Q. And for how many years did DeRewal Chemical
12 have the facility up in Allentown?

13 A. I believe that was only a couple months. I
14 mean, he may have leased it for a year, but that was
15 only a couple-month deal. What we were trying to do
16 just didn't pan out.

17 Q. What you were trying to do was create
18 gypsum?

19 A. Yes.

20 Q. And to create the gypsum you were using
21 sulphuric acid?

22 A. That's correct.

23 Q. So you were bringing sulphuric acid to the
24 Allentown facility to try to make the gypsum?

25 A. Well, I believe we -- that was correct. I

1 believe we only tried one or two loads. That's when we
2 were crazy out the gate.

3 Q. Was you ever permanently stationed in
4 Allentown?

5 A. No.

6 Q. Was there anyone that was?

7 A. Well, there were other people there that
8 were doing coal. But you're talking just us?

9 Q. Just for DeRewal, was there any DeRewal
10 person stationed there?

11 A. No.

12 Q. But other DeRewal drivers could have taken
13 materials there?

14 MR. HARRIS: Objection.

15 THE WITNESS: We only brought one or two
16 loads there.

17 BY MR. DILLON:

18 Q. How can you be certain of that?

19 A. Because I was one of them that was trying to
20 do the experiment on trying to do the gypsum.

21 Q. How was your experiment being done?

22 A. Crazy.

23 Q. Tell me how the experiment went.

24 A. Well, we went out and bought old cement
25 tanks, regular tank trucks, you know, with the barrels?

1 Put the lime inside and, you know, we were on the top.

2 And as we're feeding the acid in slowly, you
3 know, because of the reaction was so bad, I mean, you
4 couldn't even see us up there. We kept on adding lime
5 to it, you know, trying to make the gypsum. Fill it up
6 so much, let the barrel turn it in reverse and spit the
7 gypsum out.

8 Q. And it wasn't a profitable enterprise?

9 A. No. There again, it was too many fumes.

10 Q. We talked with your father about a disposal
11 location known as Iron Oxide?

12 A. Pardon?

13 Q. Iron Oxide in Elizabeth, New Jersey.

14 A. Iron Oxide, I might have been there.

15 Q. On the Arthur Krill?

16 A. Does Dan Jackson have anything to do with
17 that?

18 Q. That's the one I forgot to ask your father
19 about. But let me leave Danny Jackson -- you're
20 referring to Danny Jackson who was Marvin Jonas's
21 original partner?

22 A. I believe.

23 Q. Who had an operation in North Jersey?

24 A. That's correct.

25 Q. Let me come back to the relationship that

1 DeRewal Chemical might have had with Mr. Jackson and
2 focus on Iron Oxide for a minute. The Iron Oxide
3 facility had a large tank to accept acid. Do you
4 recall bringing material to Iron Oxide?

5 A. I can't recall. The name sounds familiar.

6 Q. The name sounds familiar to you?

7 A. Yes.

8 Q. Do you recall William Carriccino?

9 A. I heard the name.

10 Q. Did you personally take anything to Chemical
11 Control Corporation?

12 A. Where were they located?

13 Q. Mr. Carriccino's location might also be
14 listed as Elizabeth, New Jersey.

15 A. I can't recall. Was that a dump site or did
16 we pick up chemicals off them? I can't recall, I don't
17 know.

18 Q. Do you recall a site in Elizabeth, New
19 Jersey that had thousands and thousands of drums
20 stockpiled?

21 A. Yes, I do.

22 Q. Do you recall taking waste to such a
23 location?

24 A. We might have taken one or two loads there.

25 Q. Of bulk loads there?

1 A. Yes.

2 Q. You personally might have taken one or two
3 loads there?

4 A. Yeah.

5 Q. And other DeRewal drivers might have taken
6 other loads there?

7 MR. HARRIS: Objection, calls for
8 speculation.

9 THE WITNESS: I don't know.

10 BY MR. DILLON:

11 Q. You don't know?

12 A. I don't know. That was Dan Jackson, right,
13 with all the drums?

14 Q. We'll try and do Mr. Jackson next. Did you
15 ever meet Mr. Jackson?

16 A. No.

17 Q. How did you come to learn of Mr. Jackson?

18 A. I just recall his name, that's all.

19 Q. From Mr. Jonas?

20 A. Probably. I believe he --

21 Q. What do you recall about Mr. Jackson?

22 A. What do I recall about him? He had dropped
23 off a couple trailer loads of sulphuric nitric down
24 there off of Ontario Street back there in the '80s
25 sometime. And they exploded, they got real hot.